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Designated Counsel for Ignition Switch Plaintiffs

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**APPELLANTS' STATEMENT OF ISSUES ON APPEAL AND AMENDED
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Appellants-Ignition Switch Plaintiffs (the "**Appellants**"),¹ by and through their undersigned counsel, respectfully submit the following: (i) statement of issues to be presented on appeal from the *Judgment*, dated June 1, 2015 [ECF No. 13177] and *Decision on Motion to Enforce Sale Order*, dated April 15, 2015 [ECF No. 13109]; and (ii) amended designation of items to be included in the record on appeal.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Judgment or the Decision. As defined in the Judgment, the term "**Ignition Switch Plaintiffs**" shall mean plaintiffs that have commenced a lawsuit against New GM asserting economic losses based on or arising from the Ignition Switch in the Subject Vehicles (each term as defined in the *Agreed and Disputed Stipulations of Fact Pursuant to the Court's Supplemental Scheduling Order, Dated July 11, 2014*, filed on August 8, 2014 [ECF No. 12826], at 3).

I. Statement Of Issues To Be Presented On Appeal.

The Appellants submit the following statement of issues on appeal:

1. Did the Bankruptcy Court exceed its jurisdictional authority or otherwise err in holding that the Sale Order may be enforced so as to enjoin claims against New GM based on New GM's own independent, post-Closing acts or conduct?

2. Did the Bankruptcy Court err in entering a Judgment providing for enforcement of the Sale Order by enjoining and barring claims asserted against New GM where such claims "concern[] an Old GM vehicle or part," and through the creation of procedures for staying, striking or dismissing such claims?

3. Did the Bankruptcy Court err in holding that the Ignition Switch Plaintiffs must demonstrate prejudice in order to establish a due process violation in connection with the entry or enforcement of the Sale Order?

4. Did the Bankruptcy Court err in holding that the Ignition Switch Plaintiffs failed to demonstrate prejudice in connection with the entry or enforcement of the Sale Order?

5. Did the Bankruptcy Court err in failing to consider the allegations of New GM's improper concealment of the Ignition Switch Defect in connection with the entry or enforcement of the Sale Order?

6. Did the Bankruptcy Court err by not providing the Ignition Switch Plaintiffs the opportunity for further development of the factual record in connection with the enforcement of the Sale Order, including, without limitation, as to the issue of prejudice, upon the Bankruptcy Court's determination that the Ignition Switch Plaintiffs had to demonstrate such prejudice in order to establish a due process violation in connection with the entry or enforcement of the Sale Order?

7. Did the Bankruptcy Court err in applying the doctrine of equitable mootness to the claims of the Ignition Switch Plaintiffs?

8. Did the Bankruptcy Court err in holding that the rulings in the Decision and the Judgment shall apply to any other plaintiffs not represented by Designated Counsel?

II. Designation Of Items To Be Included In The Record On Appeal.

The Appellants submit the following designation of items to be included in the record on appeal (including any exhibit, annex, or addendum thereto):

Item No.	Document	Filing Date	ECF No.
1	Motion for Sale of Property under Section 363(b)/Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing	6/1/2009	92
2	Memorandum of Law In Support of Debtors' Motion Pursuant To 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365, and Fed. R. Bankr. P. 2002, 6004 and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC	6/1/2009	105
3	Certificate of Service (First Day Motion Service)	6/1/2009	134
4	Order Approving Procedures for Sale of Debtors' Assets Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Scheduling Bid Deadline and Sale Hearing Date, Establishing Assumption and Assignment Procedures and Fixing Notice Procedures and Approving Form of Notice	6/2/2009	274
5	Notice of Filing of the Amended Master Sale and Purchase Agreement and Certain Exhibits of the Disclosure Schedule Thereto	6/27/2009	2649
6	Declaration/Certificate of Publication of Notice of Sale Hearing	6/29/2009	2757

Item No.	Document	Filing Date	ECF No.
7	Declaration/Certificate of Publication of Notice of Commencement of Chapter 11 Cases and First Day Hearing	7/1/2009	2910
8	Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement	7/5/2009	2967
9	Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief	7/5/2009	2968
10	Errata Order Regarding Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of Related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement	7/6/2009	2985
11	Transcript regarding Hearing Held on 7/2/09 9:02 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	7/8/2009	3062
12	Transcript regarding Hearing Held on 6/30/09 10:07 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	7/8/2009	3087
13	Transcript regarding Hearing Held on 7/1/09 7:59 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	7/15/2009	3205

Item No.	Document	Filing Date	ECF No.
14	Debtors' Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/2/2009	3940
15	Affidavit of Service of the Notice and Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3), Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(B)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/11/2009	4020
16	Order Establishing the Deadline For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	9/16/2009	4079
17	Certificate of Publication of the Notice of Deadlines For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code (the General Notice) and the Notice of Deadline for Filing Proofs of Claim (the Local Notice))	1/5/2010	4724
18	Affidavit of Publication of Notice of Deadlines for Filing Certain Proofs of Claim	1/25/2010	4877
19	Affidavit of Service of 1) Debtors' Joint Chapter 11 Plan and 2) Disclosure Statement for Debtors' Joint Chapter 11 Plan	9/3/2010	6852
20	Debtors' Motion for an Order (I) Approving Notice of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Solicitation Packages; and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes under the Plan	9/3/2010	6854

Item No.	Document	Filing Date	ECF No.
21	Affidavit of Service of Notice of Hearing on Debtors' Motion for an Order (I) Approving Notice of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Solicitation Packages and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes Under the Plan	9/7/2010	6867
22	Notice of Certification of Publication of Notice of Hearing to Consider Approval of Debtors' Proposed Disclosure Statement with Respect to Debtors' Joint Chapter 11 Plan	10/5/2010	7239
23	Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan	12/7/2010	8014
24	Debtors' Amended Joint Chapter 11 Plan	12/7/2010	8015
25	Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan	12/8/2010	8023
26	Affidavit of Service of Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan and Debtors' Amended Joint Chapter 11 Plan	12/8/2010	8024
27	Order Granting Motion (I) Approving Notice Of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Notice Packages and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes Under the Plan	12/8/2010	8043
28	Affidavit of Service of Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan	12/10/2010	8053
29	Affidavit of Publication of the Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date	1/18/2011	8673

Item No.	Document	Filing Date	ECF No.
30	Amended Affidavit of Publication of Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date (related document ECF No. 8673)	1/21/2011	8788
31	Amended Affidavit of Publication of Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date (related document ECF No. 8788)	2/16/2011	9277
32	Debtors' Second Amended Joint Chapter 11 Plan	3/18/2011	9836
33	Affidavit of Service of Debtors' Second Amended Joint Chapter 11 Plan	3/21/2011	9845
34	Findings of Fact and Conclusions of Law and Order Pursuant to Sections 1129(A) and (B) of the Bankruptcy Code and Rule 3020 Of The Federal Rules Of Bankruptcy Procedure Confirming Debtors Second Amended Joint Chapter 11 Plan	3/29/2011	9941
35	Corrected Notice of Occurrence of Effective Date of Debtors' Second Amended Joint Chapter 11 Plan	4/6/2011	10056
36	Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective Date	5/3/2011	10151
37	Notice of Certification of Publication of the Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective Date	5/10/2011	10214
38	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2011	8/1/2011	10648
39	Supplemental Status Report - Supplement to Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2011	9/14/2011	10874
40	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of September 30, 2011	10/28/2011	11090

Item No.	Document	Filing Date	ECF No.
41	Notice of Proposed Order Approving Motion and Motion Pursuant to Bankruptcy Rule 3003 and Section 105(a) of the Bankruptcy Code for an Order Disallowing Certain Late Filed Claims	1/26/2012	11351
42	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of December 31, 2011	1/30/2012	11358
43	Order Approving Motion Pursuant to Bankruptcy Rule 3003 and Section 105(a) of the Bankruptcy Code Disallowing Certain Late Filed Claims	2/8/2012	11394
44	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	4/21/2014	12620
45	Exhibits to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	4/21/2014	12621
46	Endorsed Order Regarding Letter Dated April 21, 2014, filed by Arthur Steinberg on behalf of General Motors LLC (ECF No. 12622)	4/22/2014	12627
47	Notice of (A) Filing of Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (B) Conference to be Held in Connection with Such Motion	4/22/2014	12628
48	Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, filed by Edward S. Weisfelner on behalf of Daniel Ratzlaff, Patricia Barker, Sylvia Benton, Nicole Heuler, Katie Michelle McConnell, Carlota Onofre, and Teleso Satele, individually and as putative class representatives	4/22/2014	12629
49	Cover Page and Exhibits to Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (relates to ECF No. 12629)	4/23/2014	12640
50	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of March 31, 2014	4/24/2014	12653
51	Supplements to Schedule 1 and Schedule 2 to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce	4/30/2014	12672

Item No.	Document	Filing Date	ECF No.
52	Letter to the Honorable Robert E. Gerber Regarding May 2, 2014 Status Conference, filed on behalf of General Motors LLC	4/30/2014	12673
53	Amended Notice of (A) Filing of Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (B) Conference to be Held in Connection with Such Motion	5/1/2014	12675
54	Letter to the Honorable Robert E. Gerber in response to New GM's Letter of 4/30/2014 (ECF No. 12673), filed by Edward S. Weisfelner on behalf of Plaintiffs	5/1/2014	12677
55	Notice of Settlement of Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction; (II) Objection filed by Certain Plaintiffs in Respect Thereto; and (III) Adversary Proceeding No. 14-01929	5/12/2014	12690
56	Objection to Notice of Settlement of Scheduling Order, filed on behalf of Proposed Lead Plaintiffs	5/15/2014	12693
57	Reply to Objection to Notice of Settlement of Scheduling Order, filed by Edward S. Weisfelner on behalf of Designated Counsel	5/15/2014	12695
58	Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respects Thereto, and (III) Adversary Proceeding No. 14-01929	5/16/2014	12697
59	Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	5/19/2014	12698
60	Second Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	5/19/2014	12699
61	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of March 31, 2014	5/23/2014	12708
62	Third Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	6/2/2014	12717

Item No.	Document	Filing Date	ECF No.
63	Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/2/2014	12718
64	Corrected Third Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/2/2014	12719
65	Corrected Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/2/2014	12720
66	Fourth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/13/2014	12722
67	Fourth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	6/13/2014	12723
68	Response By General Motors LLC to Establish Stay Procedures for Newly-Filed Ignition Switch Actions, with hearing to be held on July 2, 2014	6/13/2014	12724
69	Notice of Motion of General Motors LLC To Establish Stay Procedures for Newly-Filed Ignition Switch Actions	6/13/2014	12725
70	Supplemental Response by General Motors LLC in Connection with Stay Procedures Set Forth in the Court’s May 16, 2014 Scheduling Order	6/24/2014	12735
71	Notice of Presentment of Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of General Motors	7/1/2014	12747
72	Letter to the Honorable Robert E. Gerber from Lisa Rubin, on behalf of Wilmington Trust Company as trustee and administrator of GUC Trust, responding to New GM’s Notice of Presentment (ECF No. 12747)	7/1/2014	12753

Item No.	Document	Filing Date	ECF No.
73	Notice of Presentment of Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of Wilmington Trust Company as trustee and administrator of GUC Trust	7/1/2014	12754
74	Letter to the Honorable Robert E. Gerber from Jonathan Flaxer, on behalf of Groman Plaintiffs, Regarding Proposed Counter-Order to Proposed Supplemental Scheduling Order	7/1/2014	12755
75	Notice of Presentment of Counter Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of Groman Plaintiffs	7/1/2014	12756
76	Order Granting Motion of General Motors LLC to Establish Stay Procedures for Newly-Filed Ignition Switch Actions	7/8/2014	12764
77	Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929	7/11/2014	12770
78	Fifth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	7/21/2014	12780
79	Fifth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	7/21/2014	12781
80	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of June 30, 2014	7/25/2014	12786
81	Decision with Respect to No Stay Pleading (Phaneuf Plaintiffs)	7/30/2014	12791
82	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	8/1/2014	12807

Item No.	Document	Filing Date	ECF No.
83	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	8/1/2014	12808
84	Endorsed Order, Approving General Motors Letter filed on 8/1/2014 (ECF No. 12809) Regarding Proposed Page Limits for Briefs	8/4/2014	12810
85	Order Denying the Relief Requested by the Phaneuf Plaintiffs in Their No Stay Pleading	8/4/2014	12811
86	Endorsed Order, Adding Matters Raised in New GM August 1, 2014 Letter (ECF No. 12806) to Calendar for August 18 Conference	8/4/2014	12812
87	Notice of (A) Filing of (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions), and (II) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuit, and (B) Conference to be held in Connection with Such Motions on 8/18/2014, filed on behalf of General Motors LLC	8/4/2014	12813
88	Decision with Respect to No Stay Pleading and Related Motion to Dismiss for Lack of Subject Matter Jurisdiction (Elliot Plaintiffs)	8/6/2014	12815
89	Sixth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/7/2014	12818
90	Sixth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/7/2014	12819
91	Agreed and Disputed Stipulations of Fact Pursuant to the Court's Supplemental Scheduling Order, Dated July 11, 2014	8/8/2014	12826
92	Letter to the Honorable Robert E. Gerber from Arthur Steinberg on behalf of General Motors LLC, Pursuant to July 11, 2014 Supplemental Scheduling Order Regarding Agreed Upon & Disputed Stipulations of Fact	8/8/2014	12827

Item No.	Document	Filing Date	ECF No.
93	Order Denying the Relief Requested in Plaintiffs Lawrence and Celestine Elliott's No Stay Pleading Pursuant to the Court's Scheduling Orders and Motion for Order of Dismissal for Lack of Subject Matter Jurisdiction Pursuant to Bankr. R. 7012(b) and for Related Relief	8/12/2014	12834
94	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2014	8/13/2014	12838
95	Seventh Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/14/2014	12843
96	Seventh Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	8/14/2014	12844
97	Letter to the Honorable Robert E. Gerber from Sander L. Esserman on behalf of Designated Counsel, Regarding Threshold Issues	8/15/2014	12854
98	Letter to the Honorable Robert E. Gerber from Daniel Golden on behalf of Akin Gump Strauss Hauer & Feld LLP, Regarding Threshold Issues Letters	8/15/2014	12856
99	"Limited" No Stay Pleading, filed on behalf of the People of the State of California	8/19/2014	12862
100	Endorsed Order, Approving Briefing Schedule Proposed in 8/21/2014 New GM Letter Regarding Four Threshold Issues (related document ECF No. 12867)	8/22/2014	12869
101	Response by General Motors LLC to the "Limited" No Stay Pleading Filed by the Orange County Plaintiff in Connection with the Court's July 8, 2014 Order Establishing Stay Procedures for Newly-Filed Cases, filed on behalf of General Motors LLC	8/29/2014	12876
102	Letter to the Honorable Robert E. Gerber from Arthur Steinberg on behalf of General Motors LLC, Regarding Revised Scheduling Orders and Stay Stipulations In Connection With Additional Motions to Enforce	9/10/2014	12890
103	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	9/15/2014	12897

Item No.	Document	Filing Date	ECF No.
104	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	9/15/2014	12898
105	Transcript of August 18, 2014 Hearing Regarding Threshold Issues Letters, filed pursuant to the Supplemental Scheduling Order, Dated July 11, 2014	8/21/2014	12899
106	Eighth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	9/18/2014	12906
107	Eighth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	9/18/2014	12907
108	Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	9/18/2014	12908
109	Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	9/18/2014	12909
110	Errata Order Regarding Decision with Respect to No Stay Pleading (Phaneuf Plaintiffs) (ECF No. 12791)	10/2/2014	12934
111	Ninth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	10/6/2014	12938
112	Ninth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	10/6/2014	12939
113	Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	10/6/2014	12940

Item No.	Document	Filing Date	ECF No.
114	Second Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	10/6/2014	12941
115	Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	10/6/2014	12942
116	Tenth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	10/15/2014	12950
117	Tenth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	10/15/2014	12951
118	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of September 30, 2014	10/24/2014	12963
119	Eleventh Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	11/5/2014	12976
120	Eleventh Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	11/5/2014	12978
121	Third Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	11/5/2014	12979
122	Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	11/5/2014	12980
123	Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	11/5/2014	12981

Item No.	Document	Filing Date	ECF No.
124	Appendix of Exhibits for Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	11/5/2014	12982
125	Consolidated Class Action Complaint Against New GM for Recalled Vehicles Manufactured By Old GM and Purchased Before July 11, 2009 or Later, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (JMF) (S.D.N.Y. Oct. 14, 2014) (ECF No. 347)	11/5/2014	12982-13
126	Consolidated Complaint Concerning All GM-Branded Vehicles that were Acquired July 11, 2009 or Later, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (JMF) (S.D.N.Y. Oct. 14, 2014) (ECF No. 345)	11/5/2014	12982-14
127	The Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue	11/5/2014	12983
128	Declaration of Deborah J. Newman in Support of the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue	11/5/2014	12984
129	Written Opinion signed on 11/10/2014 Regarding Decision with Respect to No Stay Pleading, and Related Motion for Abstention Regarding Sesay Plaintiffs	11/10/2014	12989
130	GUC Trust Quarterly GUC Trust Report as of September 30, 2014	11/12/2014	12997
131	Transcript of Hearing Held on 7/2/2014 9:46 AM Regarding "No Stay Pleadings" filed in Connection with Scheduling Order Regarding (I) Motion of General Motors, LLC Pursuant to 11 U.S.C. Sections 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929 (ECF No. 12697)	11/11/2014	13001
132	Transcript of Hearing Held on 8/5/2014 9:49 AM Regarding Plaintiffs Lawrence and Celestine Elliott's No Stay Pleading Pursuant to the Court's Scheduling Orders and Motion for Order of Dismissal for lack of subject matter jurisdiction pursuant to Bankr. R. 7012(B) and for related relief	11/21/2014	13003

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133	Twelfth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/1/2014	13009
134	Twelfth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/1/2014	13010
135	Fourth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	12/1/2014	13011
136	Fourth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	12/1/2014	13012
137	Thirteenth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/8/2014	13016
138	Thirteenth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction	12/8/2014	13017
139	Responsive Brief of Designated Counsel for Pre-Closing Accident Plaintiffs on Threshold Issues Concerning New GM’s Motions to Enforce the Sale Order and Injunction	12/16/2014	13021
140	Response by General Motors LLC Regarding the Equitable Mootness Threshold Issue	12/16/2014	13024
141	Designated Counsel’s Opposition to New GM’s Motions for Enforcement of Sale Order and Injunction	12/16/2014	13025
142	Declaration of Edward S. Weisfelner in Support of Designated Counsel’s Opposition to New GM’s Motions for Enforcement of Sale Order and Injunction	12/16/2014	13026
143	Anton R. Valukas, Report to Board of Directors of General Motors Company Regarding Ignition Switch Recalls, dated May 29, 2014	12/16/2014	13026-2

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144	Consent Order, In re TQ14-001 NHTSA Recall No. 14V-047 (U.S. Dep't of Transp. May 16, 2014)	12/16/2014	13026-4
145	Declaration of Steve W. Berman in Support of Designated Counsel's Opposition to New GM's Motions for Enforcement of Sale Order and Injunction	12/16/2014	13027
146	The Groman Plaintiffs' Response to that Part of New GM's Opening Brief Regarding the "Fraud on the Court Legal Standard"	12/16/2014	13028
147	Designated Counsel's Response to the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue	12/16/2014	13029
148	Response of GUC Trust Administrator and Participating Unitholders to New GM's Opening Brief on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	12/16/2014	13030
149	Declaration of Lisa H. Rubin, Esq.	12/16/2014	13031
150	Corrected Exhibit 14 to the Declaration of Lisa Rubin, Esq.	12/17/2014	13032
151	Fourteenth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	12/24/2014	13038
152	Fourteenth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction	12/24/2014	13039
153	Administrative Order Signed on 1/13/2015 Regarding Oral Argument on the Motion to Enforce and Related Matters	1/13/2015	13044
154	The Participating Unitholders' and GUC Trust Administrator's Reply Memorandum of Law Respecting the Equitable Mootness Threshold Issue	1/16/2015	13047
155	Reply Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	1/16/2015	13048
156	Appendix of Exhibits to Reply Brief By General Motors LLC on Threshold Issues Concerning Its Motions To Enforce the Sale Order and Injunction	1/16/2015	13049

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157	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of December 31, 2014	1/20/2015	13051
158	Endorsed Order Signed on 1/28/2015 Regarding Overall Time Requests and Proposed Sequence of Oral Argument	1/28/2015	13059
159	Second Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	1/28/2015	13060
160	Endorsed Order Signed on 1/30/2015 Regarding Letter to the Honorable Robert E. Gerber Pursuant to January 28, 2015 Endorsed Order Regarding Oral Argument and Related Matters (ECF No. 13064)	1/30/2015	13066
161	Letter to the Honorable Robert E. Gerber in accordance with the Court's Administrative Order, entered on January 13, 2015 [ECF No. 13044], First Endorsed Order, entered on January 28, 2015 [ECF No. 13059], and Second Endorsed Order, entered on January 30, 2015 [ECF No. 13066], filed on behalf of The People of the State of California	2/2/2015	13072
162	Response to Letter, dated February 2, 2015, Submitted by the State of California Regarding Oral Argument (ECF No. 13072)	2/3/2015	13073
163	Endorsed Order Signed on 2/9/2015 Regarding Letter Filed on behalf of The People of the State of California (ECF No. 13072)	2/9/2015	13078
164	Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of December 31, 2014	2/12/2015	13082
165	Third Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	2/13/2015	13083
166	Transcript Regarding Hearing Held on 2/18/2015 9:00 AM Regarding Oral Argument on Motion to Enforce	2/20/2015	13096
167	Fourth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	3/23/2015	13097

Item No.	Document	Filing Date	ECF No.
168	Fifth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	4/15/2015	13108
169	Decision on Motion to Enforce Sale Order	4/15/2015	13109
170	Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of March 31, 2015	4/22/2015	13118
171	Sixth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	4/28/2015	13122
172	Fifth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	4/28/2015	13123
173	Fifth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions)	4/28/2015	13124
174	Joint Letter on Behalf of GUC Trust and the GUC Trust Unitholders (Regarding Proposed Form of Judgment)	5/12/2015	13135
175	Letter Regarding Proposed Judgment in Connection to Decision On Motion To Enforce Sale Order, filed by New GM	5/12/2015	13136
176	Joint Letter Enclosing Proposed Judgment of Co-Designated Counsel and Counsel for Economic Loss Plaintiffs and Designated Counsel and Counsel for Ignition Switch Pre-Closing Accident Plaintiffs in Response to April 15, 2015 Decision (ECF No. 13109) and Endorsed Order, dated May 5, 2015 (ECF No. 13131)	5/12/2015	13137
177	Amended and Restated Exhibits 2 and 3 to Letter Regarding Proposed Judgment In Connection To Decision On Motion To Enforce Sale Order, filed by New GM	5/12/2015	13139
178	Letter Regarding Proposed Judgment, filed on behalf of Groman Plaintiffs	5/12/2015	13141

Item No.	Document	Filing Date	ECF No.
179	Status Report/Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of March 31, 2015	5/22/2015	13158
180	Decision RE: Form of Judgment	5/27/2015	13162
181	Order RE: Technical Matters Concerning Judgment	5/27/2015	13163
182	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Judgment, filed by Gary Peller on behalf of Elliot Plaintiffs	5/29/2015	13169
183	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by Arthur Steinberg on behalf of General Motors LLC	5/29/2015	13171
184	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by William Weintraub on behalf of Ignition Switch Plaintiffs in Pre-Closing Accident Lawsuits	5/29/2015	13172
185	Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by Lisa Rubin on behalf of Wilmington Trust Company	5/29/2015	13173
186	Letter to the Honorable Robert E. Gerber Regarding Certification of Direct Appeal/Request for Procedural Stay, filed by Arthur Steinberg on behalf of General Motors LLC	5/29/2015	13174
187	Letter to the Honorable Robert E. Gerber Responding to Letter Filed by Gary Peller, dated May 29, 2015 (ECF No. 13169), filed by Arthur Steinberg on behalf of General Motors LLC	6/1/2015	13176
188	Judgment	6/1/2015	13177
189	Order Certifying Judgment for Direct Appeal to Second Circuit	6/1/2015	13178
190	Amended Notice of Appeal, filed on behalf of Elliot Plaintiffs	6/1/2015	13179
191	Amended Notice of Appeal, filed on behalf of Sesay Plaintiffs	6/1/2015	13180
192	Notice of Appeal, filed on behalf of Ignition Switch Plaintiffs	6/2/2015	13185
193	Notice of Appeal, filed on behalf of Pre-Closing Accident Plaintiffs	6/10/2015	13194
194	Notice of Cross-Appeal, filed on behalf of General Motors LLC	6/12/2015	13200

Item No.	Document	Filing Date	ECF No.
195	Notice of Cross-Appeal, filed on behalf of Wilmington Trust Company	6/15/2015	13204
196	Notice of Appeal, filed on behalf of Groman Plaintiffs	6/16/2015	13209
197	Transcript for Hearing Held on 5/2/2014 at 9:46 AM Regarding Status Conference, <u>Groman, et al. v. General Motors LLC (In re Motors Liquidation Corp.)</u> , Case No. 09-50026, Adv. Pro. No. 14-01929 (Bankr. S.D.N.Y. April 21, 2014) (ECF No. 16), attached hereto as <u>Exhibit 1</u>		
198	Transcript Regarding Hearing Held on 2/17/2015 9:00 AM Regarding Oral Argument on Motion to Enforce, attached hereto as <u>Exhibit 2</u>		
199	MDL Order No. 13 (Organization of Plaintiffs' Counsel, Protocols for Common Benefit Work and Expenses), <u>In re General Motors LLC Ignition Switch Litigation</u> , Case No. 14-md-2543 (JMF) (S.D.N.Y. Sept. 16, 2014) (ECF No. 304), attached hereto as <u>Exhibit 3</u>		
200	Notice of Errata and Correction to the Consolidated Class Action Complaint Against New GM for Recalled Vehicles Manufactured by Old GM and Purchased Before July 11, 2009, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (S.D.N.Y. Nov. 3, 2014) (ECF No. 379), attached hereto as <u>Exhibit 4</u>		
201	House of Representatives, Subcommittee on Oversight and Investigations, Committee on Energy and Commerce, <i>The GM Ignition Switch Recall: Why Did It Take So Long?</i> Transcript (Washington, D.C. April 1, 2014) (" <u>Apr. 1 Cong. Hr'g</u> "), attached hereto as <u>Exhibit 5</u>		
202	Apr. 1 Cong. Hr'g, Doc. 8 (GMHEC000001727-41), attached hereto as <u>Exhibit 6</u>		
203	Apr. 1 Cong. Hr'g, Doc. 9 (GMHEC000001742-54), attached hereto as <u>Exhibit 7</u>		
204	Apr. 1 Cong. Hr'g, Doc. 12 (December 2005 Service Bulletin No. 05-02-35-007), attached hereto as <u>Exhibit 8</u>		
205	General Motors Company, GM Redoubles Safety Efforts, Announces New Recalls (Form 8-K Exhibit 99.1) (March 17, 2014), attached hereto as <u>Exhibit 9</u>		

Item No.	Document	Filing Date	ECF No.
206	General Motors Company, GM Announces 5 Safety Recalls (Form 8-K Exhibit 99.1) (May 15, 2014), attached hereto as <u>Exhibit 10</u>		
207	General Motors Company, GM Will Rework or Replace Keys on 3.16 Million U.S. Cars (Form 8-K Exhibit 99.1) (June 16, 2014), attached hereto as <u>Exhibit 11</u>		
208	General Motors Company, GM Announces Six Safety Recalls (Form 8-K Exhibit 99.1) (June 30, 2014), attached hereto as <u>Exhibit 12</u>		
209	General Motors Company, Annual Report (for the fiscal year ended December 31, 2009) (Form 10-K) (April 7, 2010), attached hereto as <u>Exhibit 13</u>		
210	General Motors Company, Annual Report (for the fiscal year ended December 31, 2010) (Form 10-K) (March 1, 2011), attached hereto as <u>Exhibit 14</u>		
211	General Motors Company, 2010 Annual Report, dated March 1, 2011, attached hereto as <u>Exhibit 15</u>		
212	General Motors Company, 2011 Annual Report, dated February 27, 2012, attached hereto as <u>Exhibit 16</u>		
213	General Motors Company, 2012 Annual Report, dated February 15, 2013, attached hereto as <u>Exhibit 17</u>		
214	General Motors Company, 2013 Annual Report, dated February 6, 2014, attached hereto as <u>Exhibit 18</u>		
215	Motors Liquidation Company GUC Trust, Initial Distribution (Form 8-K) (dated April 21, 2011, filed April 27, 2011), attached hereto as <u>Exhibit 19</u>		
216	Motors Liquidation Company GUC Trust, Current Report (Form 8-K) (May 16, 2014), attached hereto as <u>Exhibit 20</u>		
217	Motors Liquidation Company GUC Trust, Annual Report (for the fiscal year ended March 31, 2014) (Form 10-K) (May 22, 2014), attached hereto as <u>Exhibit 21</u>		

Dated: July 14, 2015
New York, New York

Respectfully submitted,

BROWN RUDNICK LLP

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